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Attorneys for Defendant  
KRAFT FOODS GROUP, INC. (erroneously sued as  
KRAFT FOODS GLOBAL, INC.)

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

GILBERT SALINAS, individually, and  
on behalf of all others similarly  
situated,

Plaintiff,

vs.

KRAFT FOODS GLOBAL, INC., and  
DOES 1 through 100, inclusive,

Defendants.

**Case No. 12-CV-02894-CW**

**CLASS ACTION**

**STIPULATION AND ~~[PROPOSED]~~ ORDER  
CONTINUING CLASS CERTIFICATION  
AND MOTION FOR SUMMARY  
JUDGMENT BRIEFING SCHEDULE**

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1 Plaintiff Gilbert Salinas ("Plaintiff") and Defendant Kraft Foods Group, Inc.  
2 ("Defendant"), by and through their respective counsel of record named herein, hereby stipulate  
3 as follows:

4 **WHEREAS**, the parties have agreed to attend private mediation on January 8, 2013;

5 **WHEREAS**, this Court set the following deadlines regarding class certification and  
6 summary judgment at the September 5, 2012 Case Management Conference: Defendant's limited  
7 Motion for Summary Judgment filed no later than January 10, 2013 and hearing on February 14,  
8 2013; Plaintiff's Motion for Class Certification filed no later than April 4, 2013 and hearing on  
9 May 9, 2013. (*see Dckt No. 19*);

10 **WHEREAS**, the parties have informally agreed to postpone any additional discovery  
11 efforts, including any depositions, as well as any meet and confer efforts regarding the written  
12 discovery currently being exchanged, until immediately after the mediation session;

13 **WHEREAS**, should mediation prove unsuccessful, the parties will require the  
14 completion of substantial meet and confer efforts, as well as additional written discovery and  
15 depositions in preparation for Defendant's Motion for Summary Judgment and Plaintiff's Motion  
16 for Class Certification;

17 **WHEREAS**, the parties will have insufficient time to complete such discovery, should  
18 mediation fail, under the current briefing schedule;

19 **WHEREAS**, there have been no prior modifications to the briefing schedules referenced  
20 herein; and

21 **THEREFORE**, the parties, through their undersigned respective counsel, stipulate and  
22 request that the Court hereby continue the briefing schedules as follows:

- 23 • Defendant's Motion for Summary Judgment due: May 10, 2013;
- 24 • Plaintiff's Motion for Class Certification due: July 4, 2013;
- 25 • Hearing Dates: *To be set by the Court*

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1 **IT IS SO STIPULATED.**

2  
3 Dated: November 26, 2012

**SCOTT COLE & ASSOCIATES, APC**

4  
5 By: /s/ Hannah R. Salassi  
6 Hannah R. Salassi, Esq.  
7 Attorneys for the Representative Plaintiff  
and the Plaintiff Class

8 Dated: November 26, 2012

9 **OGLETREE, DEAKINS, NASH, SMOAK &**  
10 **STEWART, P.C.**

11 By: /s/ Christopher M. Ahearn  
12 Douglas J. Farmer  
13 Michael J. Nader  
14 Christopher M. Ahearn  
15 Attorneys for Defendant  
16 KRAFT FOODS GROUP, INC. (erroneously sued  
17 as KRAFT FOODS GLOBAL, INC.)  
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~~[PROPOSED]~~ ORDER


**IT IS HEREBY ORDERED** that:

The briefing schedules for Plaintiff and Defendant are hereby continued as follows:

- Defendant's Motion for Summary Judgment due: May 10, 2013
- Hearing on Motion for Summary Judgment: June 20, 2013
- Plaintiff's Motion for Class Certification due: July 4, 2013;
- Hearing on Motion for Class Certification: August 8, 2013

For good cause shown, **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 11/27/2012

  
The Honorable Claudia Wilken  
United States District Judge

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